

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

SEP 17 2 16 PM '97

Postal Rate and Fee Changes, 1997

Docket No. R97-1

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
THE UNITED STATES POSTAL SERVICE (NAA/USPS-16-17)
September 17, 1997**


The Newspaper Association of America hereby submits the attached interrogatories to the United States Postal Service and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

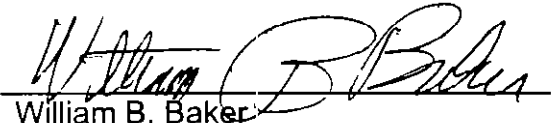
By:


William B. Baker
Alan R. Jenkins
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

September 17, 1997


William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
THE UNITED STATES POSTAL SERVICE (NAA/USPS-16-17)

NAA/USPS-16. Please refer to the answer NAA/USPS-13 (c) and (d), which did not confirm that the Postal Service has developed data showing the extent of on-time performance on a facility and market basis, respectively. Please also refer to a press release issued by the United States Postal Service on June 25, 1997, entitled "U.S. Postal Service Makes The 'Honor Roll' In Local Mail Service; Set New Record For On-Time Delivery."

- a. Please confirm that the press release states, in part, that the cities of Omaha and Seattle received the best local mail service in the nation during the period covered by the release.
- b. Please confirm that, according to the press release, nine other cities received on time delivery of 95 percent of overnight First Class Mail during the period covered by the release.
- c. Please confirm that the press release reports on the delivery performance of overnight First Class Mail received by a number of other cities during the period covered by the release.
- d. Please confirm that the data reported by the press release constitute a measure of the extent of on-time performance on a market basis. If you cannot confirm, please explain why not.
- e. Please confirm that the press release reports on the delivery performance of overnight First Class Mail received by "Northern Virginia" during the period covered by the release.
- f. Please confirm that the reference to "Northern Virginia" in the press release is a reference to First Class Mail processed at the U.S. Postal Service facility in Merrifield, Virginia. If you cannot confirm, please indicate what facilities are meant by "Northern Virginia."
- g. Please confirm the data reported by the press release regarding Northern Virginia constitute a measure of the extent of on-time performance on a facility basis. If you cannot confirm, please explain why not.

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
THE UNITED STATES POSTAL SERVICE (NAA/USPS-16-17)

NAA/USPS-17. Please refer to the answer to NAA/USPS-2(b), which indicates that as a "general rule, Areas and other field organizations do not have advertising budgets."

- a. Do any "Areas" or "other field organizations" have advertising budgets as an exception to the "general rule"?
- b. How many "Areas" or "other field organizations" have advertising budgets as an exception to the general rule?